



April 6, 2001

Ronald Cabe
Senior Director, Project Development
Dynegy Marketing and Trade
1000 Louisiana Street
Houston, Texas 77002

Dear Mr. Cabe

**EL SEGUNDO POWER REDEVELOPMENT PROJECT
2nd ROUND DATA REQUESTS ADDENDUM**

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff requests the information specified in the enclosed data requests. The information requested is necessary to: 1) more fully understand the project, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the project will result in significant environmental impacts, 4) assess whether the facilities will be constructed and operated in a safe, efficient and reliable manner, and 5) assess potential mitigation measures.

This Addendum to the 2nd Round of data requests (#135-150) is being made in the areas of water and soil resources. Written responses to the enclosed data requests are due to the Energy Commission staff on or before April 27, 2001, or at such later date as may be mutually agreed.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, you must send a written notice to both Commissioner Robert Pernell, Presiding Committee Member for the Nueva Azalea Power Plant Project proceeding, and to me, within 15 days of receipt of this notice. The notification must contain the reasons for not providing the information, the need for additional time and the grounds for any objections (see Title 20, California Code of Regulations section 1716 (e)).

If you have any questions, please call me at (916) 653-1245, or E-mail me at jreede@energy.state.ca.us.

Sincerely,

s/James W. Reede, Jr.
Energy Facility Siting Project Manager

Enclosure
cc: POS

**El Segundo Power Redevelopment
Data Requests
(00-AFC-14)**

TECHNICAL AREA: Soils and Water Resources

AUTHOR: Rich Sapudar, Tim Landis, Joe Crea, Dominique Brocard

BACKGROUND

The AFC does not discuss some of the areas that will be used for construction and/or operation of the ESPR. These include the tank and other staging/laydown areas; new pipeline corridors and roads or other existing transportation facilities. From the Workshop March 28, 2001, these areas have now been made part of the project. These additions will require discussion and figures that were not in the original and subsequent data requests.

DATA REQUEST

135. Provide figures that clearly show the existing and ESPR elements including the temporary laydown, roads and other lineal corridors to be used during demolition and construction. These figures should be to the same scale as the AFC drawings and clearly show the pre and post site and associated facility conditions.
136. Provide pre and post drainage calculations, clearly showing contours, capacities, direction of flow and other runoff information to allow for an assessment of the existing and ESPR runoff conditions.
137. Provide road and other lineal facilities (pipelines etc) figures, showing construction and ESPR conditions.

BACKGROUND

It is not clear in the AFC whether the retention basin will be used for construction and/or ESPR operations. The local county flood control and regional board currently require retention of storm runoff from construction and operation site facilities. These will require either a temporary and/or permanent retention basin for stormwater runoff.

DATA REQUEST

138. Provide a characterization of the process and stormwater flows that will be retained onsite for a period of time as required.
139. Show these flows on a schematic for construction and operation conditions.
140. Provide a figure of the current retention basin, including the broad crested weir, overflow basin and inflows and outflows for both existing and future conditions for both of these basins.

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BACKGROUND

The AFC discusses several environmental site assessments that were performed for the current project and purchase of the SCE tank property. There is known water and soil contamination from several potential sources described in all of these reports. This contamination is both at the surface and extends to approximately 20 ft depths depending on the location.

DATA REQUEST

141. Provide a current Phase I and II Environmental Site Assessment (ESA) for both the construction and operation areas of the ESPR. These should include:
- Assessment work plans for Phase II ESAs.
 - Any discussions and requirements from the RWQCB
 - Results of testing
 - Updates as progress on these assessments are completed

BACKGROUND

Because the ESPR project will entail total earthmoving greater than 5 acres, a National Pollution Discharge Elimination System (NPDES) permit for Stormwater Runoff from Construction Activities is required. The Los Angeles Regional Water Quality Control Board (LARWQCB) has indicated that all areas involving earthwork associated with the ESPR project will be included in one NPDES permit. To evaluate the affected environment and potential impacts from stormwater runoff, it is necessary to identify run on/runoff quantities and quality of the ESPR site and areas associated with the project (laydown/staging areas, parking area, linear facilities, and tank demolition south of the proposed power plant). In order to evaluate/analyze the impacts related to stormwater and erosion/sedimentation, Staff has requested a draft Stormwater Pollution Prevention Plan (SWPPP) for previous power plant projects. Stormwater and erosion/sediment control plans are components of the SWPPP. These plans are crucial to evaluate impacts related to ESPR stormwater quantity and quality.

DATA REQUEST

142. Provide the pre- and post-discharge for the 100-year frequency and 24-hour duration runoff event. Provide supporting data regarding the routing of off- and on-site runoff during these runoff events.
143. Provide the location of Discharge structure No. 002 on the mapping so Staff can evaluate the entire existing and proposed drainage routes for discharge capacity.
144. Provide a draft stormwater and an erosion/sediment control plan for the facility and associated linear facilities that includes the following:

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- Map drawings of 1"=100' or less that depict existing and proposed topography (contours) with labeled elevation numbers, structures, facilities, staging areas, and soil stockpile areas on the drawings (both on site and off site)
- Best Management Practices and a construction sequence on the drawings
- A complete mapping symbols legend on the drawings
- On site stormwater calculations in the narrative
- Address procedures that were used to handle potential construction runoff impacts.
- Maintenance and monitoring protocol for erosion, stormwater runoff control and stabilization procedures.

145. Provide a hazardous materials storage and disposal plan that includes spill prevention and containment measures associated with all onsite and offsite project activities. Provide a draft workplan that addresses the handling and disposal of contaminated soils/groundwater, and that identifies all agencies and permits regulating contaminated groundwater resulting from demolition/construction operations, including dewatering and treatment operations, and the discharge and/or disposal of this water.

BACKGROUND

The AFC mentions that major cut and fill operations are not anticipated. Staff has requested conceptual volumes of cut and fill for previous power plants. The volume of cut versus fill for all construction activities associated with the ESPR project will allow Staff to analyze grading impacts and to determine impacts related to the handling and/or disposal of excess fill.

DATA REQUEST

146. Provide a conceptual volume of cut and fills for grading and as excess spoil material. Include all construction areas and pipeline trenches.

BACKGROUND

The AFC water resource section discussions rely heavily on the current and future requirements of the NPDES and associated permits. In order to assess how the potential water resource impacts are going to be mitigated, furnish data and analysis to show how these conceptual construction and operation permit conditions will be addressed. For example, on page 5.5-2 there is a bullet that is one of a list of additional key characteristics that the ESPR team has developed which states "*Extensive pre-submittal consultation with the following agencies or city entities.*" One of the key regulatory agencies will be the Los Angeles RWQCB.

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DATA REQUEST

147. List any local RWQCB water resource construction and operation concerns that were the result of these pre-submittal consultations and how they will be met by the project.

BACKGROUND

The AFC discusses the 303(d) status of Santa Monica Bay, and presents a list of pollutants / stressors for which the bay exceeds water quality standards (AFC Table 5.5-5). AFC Table 5.5-7 provides a list of constituents for which the project has effluent limits which the project's discharge must meet

AFC Table 5.5-22 presents a list of waste streams and the estimated concentrations of selected constituents. This table is incomplete, and does not list all relevant in-plant process waste streams, nor does it include estimated concentrations for the 303(d) constituents listed on Table 5.5-5 based on expected source water concentrations.

AFC Figure 5.5-2 presents a water flow schematic for Units 1, 2, 3, and 4. The diagram is incomplete, as it does not include the flows/water balance for Units 5, 6, and 7.

DATA REQUEST

148. Revise Table 5.5-22 to include all significant in-plant waste streams and volumes, e.g., boiler blowdown, wash wastes, inlet cooling blowdown, reverse osmosis/demineralizer reject wastewater, softener regenerate waste, HRSG blowdown, steam turbine blowdown, equipment drains, etc.
149. Revise Table 5.5-22 to include all elements listed on Table 5.5-5. These estimates should be based on the concentrations of constituents (elements) contained in the source water(s), i.e., reclaimed, potable, etc., determined using an analytical method with detection limits comparable to USEPA Method 200.8 (Inductively Coupled Plasma-Mass Spectroscopy).
150. Revise Figure 5.52 to provide flows/water balance for Units 5, 6, and 7.

BACKGROUND

The impingement and entrainment of aquatic life related to the operation of the existing once-through cooling system has been raised as an issue. The status of the project's NPDES permit with regard 316(a) and (b) requirements requires resolution as quickly as possible. This aspect of the project will be particularly important should any additional data and/or studies be required to determine impacts or mitigation for significant impacts.

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DATA REQUEST

151. Provide a letter summarizing consultations with the LARWQCB and the USEPA Region 9 regarding the 316(b) aspects of the intake structure. The consultation should include evaluation under the existing 316(b) guidelines and the upcoming 316(b) rules for existing electrical generators.
152. Provide a copy of the letter from the LARWQCB responding to the letter dated December 13, 2000 to Deborah J. Smith of the LARWQB from David Loyd of El Segundo Power II LLC (AFC Appendix H, Attachment H-9) requesting determination of existing discharge under the California Thermal Plan.